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March 2, 1998

RECEIVED

MAR 2 - 1998

Federal Communications Commission
Office of Secretary

VIA HAND DELIVERY
Magalie Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Dkt. 97-253, RM-9198
KKLK(FM), Daingerfield, TX
Comments

Dear Ms. Salas:

Transmitted herewith, on behalf of OARA, Inc., licensee of KKLK(FM), Daingerfield, Texas, are an original and four copies of its Comments in the above-referenced rulemaking proceeding to amend the FM table of allotments to substitute Channel 295C3 for Channel 295A at Daingerfield, Texas, reallot Channel 295C3 from Daingerfield to Ore City, Texas, and modify KKLK(FM)'s license to specify operation on Channel 295C3 at Ore City.

If questions arise, please contact the undersigned attorney.

Sincerely,

Ann Bavender
Counsel for OARA, Inc.

Enclosure

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Dkt. No. 97-253
of the Commission's Rules,	)	RM-9198
FM Table of Allotments	)	
(Daingerfield and Ore City, Texas)	)	

To: Chief, Allocations Branch

COMMENTS

OARA, Inc. ("OARA"), licensee of KKLK(FM) (prior KWSK(FM)), Daingerfield, Texas, by its attorneys, hereby submits its comments in response to the Notice Of Proposed Rule Making ("NPRM") released January 9, 1998 in the above-captioned rulemaking proceeding in which it is proposed to substitute Channel 295C3 for Channel 295A at Daingerfield, Texas, reallot Channel 295C3 to Ore City, Texas, and modify KKLK(FM)'s license to change the community of license from Daingerfield, Texas to Ore City, Texas to provide a first local service to Ore City.

1. OARA hereby incorporates by reference its Petition For Rulemaking ("Petition") filed in this proceeding. As demonstrated in the Petition, the aforementioned substitution, reallotment, and modification will serve the public interest by providing Ore City with its first local service.

2. OARA restates its present intention to apply for authorization to modify KKLK(FM)'s facilities if the requested substitution, reallotment, and modification are made. If granted, OARA will promptly construct the authorized facilities.

3. OARA submits the attached engineering statement of James McWain in response to the NPRM's request for additional information.

WHEREFORE, for the foregoing reasons, the Commission should substitute Channel 295C3 for Channel 295A at Daingerfield, Texas, reallot Channel 295C3 to Ore City, Texas, and modify KKLK(FM)'s license to change the community of license from Daingerfield, Texas to Ore City, Texas.

Respectfully submitted,

OARA, INC.

By: _____
Ann Bavender
Its Attorney

Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street, 11th Floor
Arlington, Virginia 22209
(703) 812-0400

March 2, 1998

jr/ab-misc23/oaradgrm.com

Technical Exhibit

Comments in support of
Petition for Rulemaking

KKLK Daingerfield, TX (295A) to Ore City, Tx (295C3)
(Call Sign changed from KWSK to KKLK after Petition for Rulemaking filed)

SUMMARY

This exhibit was prepared to present additional technical information for OARA, Inc. in support of a petition to amend the Table Of Allocations (Section 73.202 (b) of the Rules).

List of Exhibits:

E-1	Page 1	Contours Study 295C3
	Page 2	Contours Study 295A
	Page 3	Loss Area
	Figure 1	Map of 60dBU Contours
	Figure 2	Map of Loss Area (Expanded)
E-II		Services in Loss Gain Areas.

DECLARATION

I, JAMES McWAIN, declare that;

1. That I am the Technical Director of OARA, Inc.

2. That all statements and representations of fact contained in this technical exhibit are true and correct of my own knowledge.

Date: February 26, 1998

James McWain

OARA, Inc.
College Station, TX
EXHIBIT E-I
60dbu Contours

Distance to Contour

Title: 295C3-Ore City
Audit File: con01198.A01
Based on 3 Second Terrain Data
Reference City: Ore City, TX

Latitude: 32-52-55
Longitude: 94-49-18

True Radial Bearing	Average Elevation	Radiation Center Height Above Average Terrain	Effective Radiated Power		Distance to Contour 60.0 dBu F(50,50)
Degrees	meters	meters	kW	dBk	km
0.00	86.3	121.8	25.000	13.979	42.25
17.00	84.0	124.1	25.000	13.979	42.55
18.00	85.3	122.7	25.000	13.979	42.37
19.00	86.5	121.6	25.000	13.979	42.22
20.00	87.6	120.5	25.000	13.979	42.09
21.00	90.0	118.1	25.000	13.979	41.77
22.00	91.0	117.1	25.000	13.979	41.64
23.00	95.5	112.6	25.000	13.979	41.01
45.00	96.6	111.5	25.000	13.979	40.86
90.00	110.4	97.7	25.000	13.979	38.69
135.00	117.6	90.5	25.000	13.979	37.41
180.00	121.3	86.8	25.000	13.979	36.72
225.00	111.3	96.8	25.000	13.979	38.54
270.00	114.5	93.6	25.000	13.979	37.98
315.00	106.8	101.3	25.000	13.979	39.29
Additional Radials from USGS topographic maps					
25.00	100.4	107.7	25.000	13.979	40.29
30.00	103.1	105.0	25.000	13.979	39.88
35.00	99.8	108.3	25.000	13.979	40.38
40.00	97.0	111.1	25.000	13.979	40.80

Radiation Center (AMSL): 208.1 meters 682.7 feet
Average Terrain (AMSL): 108.1 meters 354.6 feet
Radiation Center (HAAT): 100.0 meters 328.1 feet
Area Within 60.0 dBu F(50,50) Contour is 1836.9 sq. mi. or 4757.5 sq. km
Population Within 60.0 dBU F(50,50) Contour is 94017

OARA, Inc.
College Station, TX
EXHIBIT E-I
60dbu Contours
Page 2

Distance to Contour

Title: 295A-Daingerfield
Audit File: con01198.A02
Based on 3 Second Terrain Data
Reference City: Daingerfield, TX

Latitude: 33-02-20
Longitude: 94-44-54

True Radial Bearing	Average Elevation	Radiation Center Height Above Average Terrain	Effective Radiated Power		Distance to Contour 60.0 dBu F(50,50)
Degrees	meters	meters	kW	dBk	km
0.00	111.9	151.1	1.100	0.414	23.16
17.00	119.4	143.6	1.100	0.414	22.63
18.00	119.8	143.2	1.100	0.414	22.60
19.00	120.1	142.9	1.100	0.414	22.58
20.00	119.5	143.5	1.100	0.414	22.62
21.00	119.6	143.4	1.100	0.414	22.61
22.00	119.7	143.3	1.100	0.414	22.61
23.00	119.8	143.2	1.100	0.414	22.60
45.00	118.6	144.4	1.100	0.414	22.68
90.00	117.1	145.9	1.100	0.414	22.80
135.00	133.4	129.6	1.100	0.414	21.60
180.00	109.2	153.8	1.100	0.414	23.35
225.00	90.2	172.8	1.100	0.414	24.61
270.00	90.2	172.8	1.100	0.414	24.61
315.00	107.4	155.6	1.100	0.414	23.48

Radiation Center (AMSL): 263.0 meters 862.9 feet
Average Terrain (AMSL): 109.8 meters 360.1 feet
Radiation Center (HAAT): 153.2 meters 502.8 feet
Area Within 60.0 dBu F(50,50) Contour is 656.2 sq. mi. or 1699.5 sq. km
Population Within 60.0 dBU F(50,50) Contour is 36109

OARA, Inc.
College Station, TX
EXHIBIT E-1
Page 3
Loss Area

Title: Loss Area
Audit File: nco02118.A01

Contour #1 1, 295A Location: 33 2 20 94 44 54

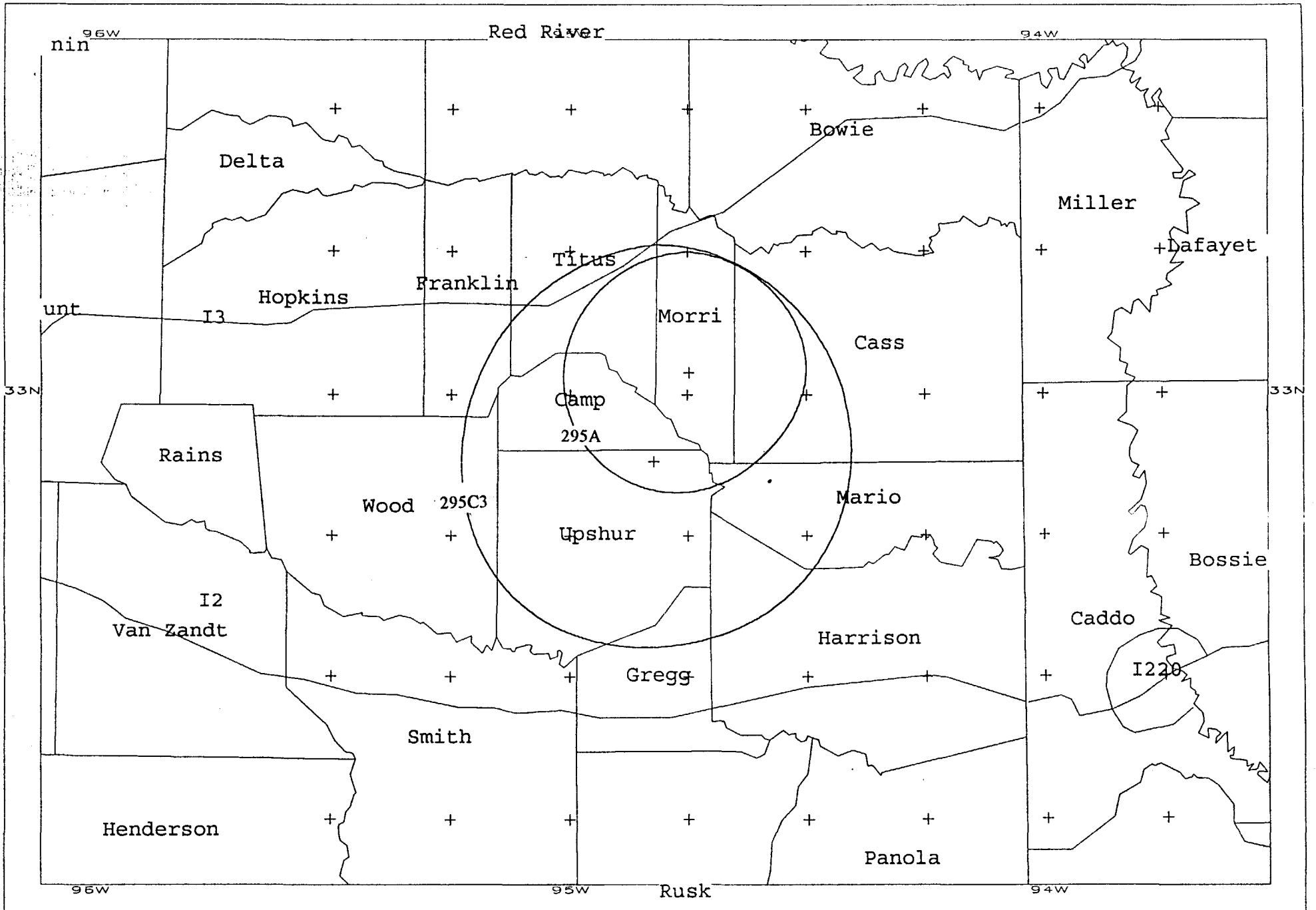
Azimuth	Dist (km)	Azimuth	Dist (km)	Azimuth	Dist (km)
0.00	23.16	17.00	22.63	18.00	22.60
19.00	22.58	20.00	22.62	21.00	22.61
22.00	22.61	23.00	22.60	45.00	22.68
90.00	22.80	135.00	21.60	180.00	23.35
225.00	24.61	270.00	24.61	315.00	23.48

Contour #2 1, 295C3 Location: 32 52 55 94 49 18

Azimuth	Dist (km)	Azimuth	Dist (km)	Azimuth	Dist (km)
0.00	42.25	17.00	42.55	18.00	42.37
19.00	42.22	20.00	42.09	21.00	41.77
22.00	41.64	23.00	41.01	45.00	40.86
90.00	38.69	135.00	37.41	180.00	36.72
225.00	38.54	270.00	37.98	315.00	39.29

Area of contour #1 .. 1700.750 square km
Area of contour #2 .. 4774.408 square km
Common area .. 1697.878 square km

Loss Area -- 2.87 square km
Gain Area -- 3076.53 square km

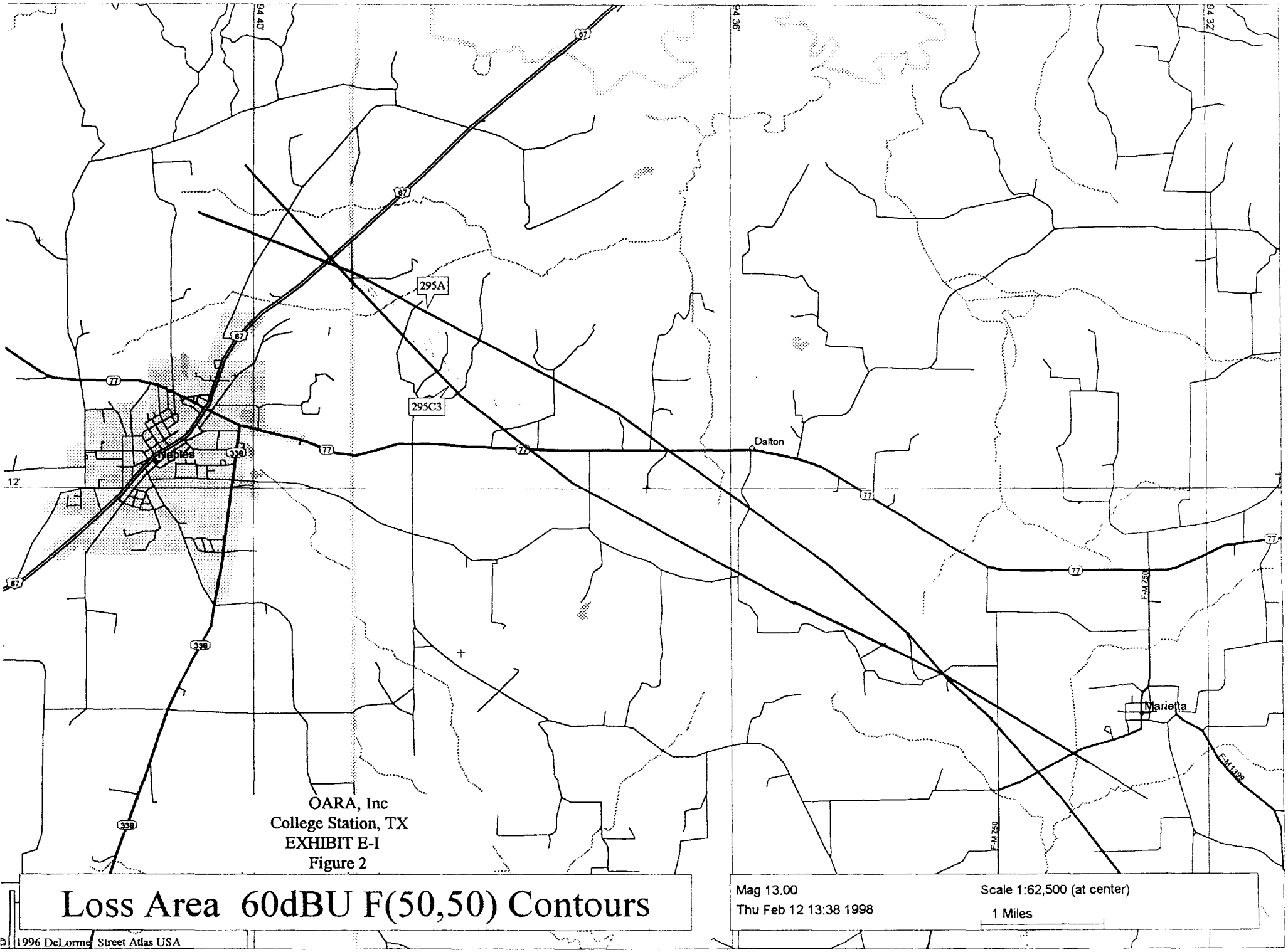


Title: 60 dBU F(50,50) Contours
Scale 1:1000000

Map Center: 32 52 54 N 94 49 18 W

0 10 20 30 40 50 km

OARA, Inc
College Station, TX
EXHIBIT E-I
Figure 1



OARA, Inc
College Station, TX
EXHIBIT E-I
Figure 2

Loss Area 60dBU F(50,50) Contours

Mag 13.00
Thu Feb 12 13:38 1998

Scale 1:62,500 (at center)
1 Miles

OARA, Inc.
College Station, TX

EXHIBIT E-II
Services in Loss-Gain Areas

OARA, Inc conducted a study to determine the service within the loss and gain areas. The 2 mv/m contours were calculated for AM stations and the 1mv/m contours were calculated for FM stations. The stations with contours that overlapped the loss or gain areas are listed:

Stations with service in Loss Area:

KCMC --- 740 AM-- Texarkana, TX
KIMP --- 960 AM-- Mount Pleasant, TX
KBNB ---1060 AM-- Gilmer, TX
KEGG ---1560 AM-- Daingerfield, TX
KEWL --- 95.1 FM-- New Boston, TX
KTAL --- 98.1 FM-- Texarkana, TX
KPXI ---100.7 FM-- Mount Pleasant, TX
KZRB ---103.5 FM-- New Boston, TX
KYKX ---105.7 FM-- Longview, TX

Stations with service in Gain Area:

KCMC --- 740 AM-- Texarkana, TX
KALT --- 900 AM-- Atlanta, TX
KIMP --- 960 AM-- Mount Pleasant, TX
KBNB ---1060 AM-- Gilmer, TX
KFRO ---1370 AM-- Longview, TX
KEES ---1430 AM-- Gladewater, TX
KEGG ---1560 AM-- Daingerfield, TX
KCUL --- 92.3 FM-- Marshall, TX
KTYL --- 93.1 FM-- Tyler, TX
KEWL --- 95.1 FM-- New Boston, TX
KFRO --- 95.3 FM-- Gilmer, TX
KALK --- 97.7 FM-- Winfield, TX
KTAL --- 98.1 FM-- Texarkana, TX
KPXI --- 100.7 FM-- Mount Pleasant, TX
KNUE ---101.5 FM-- Tyler, TX
KXAL ---103.1 FM-- Pittsburg, TX
KZRB ---103.5 FM-- New Boston, TX
KZEY --- 103.9 FM-- Marshall, TX
KKUS --- 104.1 FM-- Tyler, TX
KJTX --- 104.5 FM-- Jefferson, TX
KYKX ---105.7 FM-- Longview, TX
KISX ---107.3 FM-- Whitehouse, TX